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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

JOSEPH TAYLOR, MICK CLEARY, and
JENNIFER NELSON, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-CV-07956-VKD

**DECLARATION OF CHAD E. BELL IN
SUPPORT OF PLAINTIFFS' MOTION
FOR STAY**

Judge: Hon. Virginia K. DeMarchi

1 I, Chad E. Bell, declare as follows:

2 1. I am an attorney at Korein Tillery LLC, counsel to Plaintiffs in the above-captioned
3 matter. I am admitted to appear before this Court *pro hac vice* in this matter. I submit this
4 Declaration in support of Plaintiffs' Motion for Stay. I have personal knowledge of the facts set
5 forth in this Declaration and, if called as a witness, I could and would competently testify to these
6 facts under oath.

7 2. Attached as **Exhibit 1** is a true and correct copy of the Complaint in *Csupo v.*
8 *Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated August 9, 2019.

9 3. Attached as **Exhibit 2** is a true and correct copy of the Order After Hearing on July
10 17, 2020 in *Csupo v. Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated August 21, 2020.

11 4. Attached as **Exhibit 3** is a true and correct copy of the Order Concerning: (1) the
12 Parties' Expert Exclusion Motions; and (2) Plaintiffs' Class Certification Motion in *Csupo v.*
13 *Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated October 26, 2023.

14 5. Attached as **Exhibit 4** is a true and correct copy of the Order Concerning:
15 (1) Defendant's Motion for Summary Judgment or, in the Alternative, Summary Adjudication;
16 and (2) Defendant's Motion to Seal in *Csupo v. Google LLC*, No. 19CV352557 (Cal. Super. Ct.),
17 dated May 2, 2025.

18 6. Attached as **Exhibit 5** is a true and correct copy of the Order Concerning:
19 (1) Defendant's Motion to Decertify; and (2) Plaintiffs' Motion to Add Classwide Transfers in
20 *Csupo v. Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated May 12, 2025.

21 7. Attached as **Exhibit 6** is a true and correct copy of the Order Concerning:
22 (1) Plaintiffs' Motion to Exclude Expert Testimony; (2) Defendant's Motions to Exclude Expert
23 Testimony; and (3) Plaintiffs' Motion to Exclude Surprise Witnesses in *Csupo v. Google LLC*, No.
24 19CV352557 (Cal. Super. Ct.), dated May 27, 2025.

25 8. Attached as **Exhibit 7** is a true and correct copy of the Jury Verdict in *Csupo v.*
26 *Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated July 1, 2025.

1 9. Attached as **Exhibit 8** is a true and correct copy of Google’s Motion for Judgment
2 Notwithstanding the Verdict or a New Trial in *Csupo v. Google LLC*, No. 19CV352557 (Cal.
3 Super. Ct.), dated August 7, 2025.

4 10. Attached as **Exhibit 9** is a true and correct copy of Plaintiffs’ Opposition to
5 Google’s Motion for Judgment Notwithstanding the Verdict or New Trial in *Csupo v. Google LLC*,
6 No. 19CV352557 (Cal. Super. Ct.), dated August 27, 2025.

7 11. Attached as **Exhibit 10** is a true and correct copy of an email string between W.
8 Somvichian and T. Duarte re *Csupo v. Google LLC*, No. 19CV352557 (Cal. Super. Ct.), dated
9 between August 5–6, 2025.

10 I declare under penalty of perjury that the foregoing is true and correct.

11
12 Dated: August 29, 2025

Respectfully submitted,

13 /s/ Chad E. Bell

14 Chad E. Bell